IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13

GINGER RAE RAMSEY :

Debtor : CASE NO. 1:16-bk-00001

:

Specialized Loan Servicing LLC, as : servicer for The Bank of New York : Mellon FKA The Bank of New York, as : Trustee for the certificateholders of : CWABS, Inc., Asset-Backed Certificates, :

Series 2007-10 :

Movant

GINGER RAE RAMSEY

Respondent :

ANSWER TO MOTION FOR RELIEF FROM STAY

- 1. Admitted.
- 2. Admitted.
- 3. Admitted.
- 4. This paragraph paraphrases of a portion of a document, which is attached to as an exhibit to the Motion and which speaks for itself; to the extent that this paraphrase conflicts with the actual wording or meaning of the document, it is denied.
- 5. Admitted.
- 6. Admitted that the debtor fell behind; however, she intends to cure the arrearages either through a stipulation or an amended plan.
- 8. The debtor is verifying her records to determine whether the alleged amount is accurate and intends to cure the actual arrearages and therefore this paragraph is denied as to the exact amount of arrearages.
- 9. This paragraph is a conclusion of law to which no answer is necessary; to the extent that an answer is deemed necessary, it is denied.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Kara K. Gendron

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